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LA-UR: 18-31693

Locates Action No.:

Mr. John E. Kieling
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
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Subject: Clarification of Information Included with Anticipated Noncompliance Notification (EPC-DO: 18-433)

On November 29, 2018 Triad National Security, LLC (Triad) and the US Department of Energy (DOE) National Nuclear Security Administration Los Alamos Field Office (NA-LA) submitted a letter (EPC-DO: 18-433; LA-UR-18-30998) notifying of an anticipated noncompliance with the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit in accordance with Permit Section 1.9.11. On December 5, 2018, NMED contacted Triad by phone with questions regarding the submitted document. During the call, questions regarding the columns labeled "Generation Date" and "Facility Storage Date" within the Enclosure 1 table of the submitted correspondence were raised by NMED. Questions associated with clarification of each of the dates within the respective columns, as well as the relationship of the dates to one another were asked to be clarified, as well as a specific question regarding the dates associated with container W846065. This submittal provides additional information to provide clarification.

The "Generation Date" column as included within the table is the date a container is created in the database utilized at LANL for waste characterization and container documentation, known as Waste Compliance and Tracking System (WCATS). Once a container is created in WCATS, it is assigned a container number and a "Generation Date" associated with that container number. This process typically occurs prior to actual waste generation and is not generally directly associated with when waste is placed into a central accumulation area or permitted storage unit for storage. The addition of this column within the anticipated noncompliance notification was not necessary and provides no valid input to the notification.

The "Facility Storage Date" column, denotes the date that each of the waste containers was placed in either a central accumulation area or a permitted storage unit. Waste within the nine containers referenced in the correspondence was initially collected within Satellite Accumulation Areas (SAAs), which do not require

an accumulation start date, and subsequently placed in a central accumulation area or directly in a permitted storage unit, that does require an accumulation start date. A "Facility Storage Date" gets assigned when a waste container leaves the SAA and enters a central accumulation area or a permitted storage unit. The dates listed within the "Storage Expiration" column of the table are one year after the waste was placed in a permitted storage unit.

In general, the differences in time between the "Generation Date" and "Facility Storage Date" are due to the creation of the container in WCATS and the placement of the container within an accumulation or storage area with a time requirement. This length of time can vary depending on how the waste is packaged within the SAA or if it is packaged and moved into the accumulation/storage area on the same day.

However, there is an exception to this generalization associated with container W846065. The "Generation Date" listed as 08-14-2018 and the "Facility Storage Date" is 08-09-2018. Occasionally, a container is put into service, at a central accumulation area and is later added to WCATS where it is assigned a "Generation Date". Therefore, the "Facility Storage Date", or the date that the container started the storage time limitation clock, is prior to the "Generation Date" of the container. During that time, the operating record utilizes a hardcopy inventory within the area or a local spreadsheet maintained by the generator.

Please contact Patrick L. Padilla (Triad) at (505) 667-3932 if you have questions.

Sincerely,



Enrique Torres
Division Leader
Environmental Protection and Compliance Division
Triad National Security, LLC

Sincerely,



Karen E. Armijo
Permitting and Compliance Program Manager
National Nuclear Security Administration
U.S. Department of Energy

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